

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

---

BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 17-CV-3058  
(SRN)

LINDSEY MIDDLECAMP,

Defendants.

---

BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 18-CV-466  
(SRN)

GRACE MILLER,  
CATHERINE SCHAEFER,

Defendants.

---

BROCK FREDIN,

Plaintiff,

--against--

JAMIE KREIL,

District Court Case No. 20-CV-01929  
(SRN)

Defendant.

---

**CORRECTED DECLARATION OF BROCK FREDIN**

STATE OF WISCONSIN }  
ss:  
COUNTY OF SAINT CROIX }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceeding. I submit this declaration in support of my motion for sanctions and show cause response filed on January 3, 2022. For the reasons stated herein and within the memorandum of law in support of sanctions and response, I respectfully seek sanctions against Defendants and their counsel Robins Kaplan and Kutak Rock.

## **AUTHENTICATION OF DOCUMENTS**

2. Attached hereto as Exhibit A is a true and correct copy of summary screenshots of the Youtube video titled “Philip Sieff – Predator and Drug Addict” dated December 11, 2021.

3. Attached hereto as Exhibit B is a true and correct copy of summary screenshots of the Youtube video titled “Anne Lockner– Manages Robins Kaplan With Team Of Drug Addicts” dated December 11, 2021.

4. Attached hereto as Exhibit C is a true and correct copy of summary screenshots of the Youtube video titled “K. Jon Breyer– Rapes Women And Abuses Associates” dated December 11, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of summary screenshots of the Youtube video titled “Anne Lockner – Drafts Laughter Ban Order For Kim Jong Un” dated December 29, 2021.

6. Attached hereto as Exhibit E is a true and correct copy of summary screenshots of the Youtube video titled “Mahesha Subbaraman – Quintessential Low-T Sh\*tlaw Attorney” dated December 13, 2021.

7. Attached hereto as **Exhibit F** is a true and correct copy of summary screenshots of the Youtube video titled “K. Jon Breyer: Devoted to Defending Fraudsters, Felons and Pedophiles” dated October 11, 2021.

8. Attached hereto as **Exhibit G** is a true and correct copy of summary screenshots of a ProtestPress.com article titled “K. Jon Breyer: Low-IQ Ambulance Chaser Defending Convicting Fraudsters” with an Internet address of “<https://www.protestpress.com/k-jon-breyer-low-iq-ambulance-chaser-defending-convicted-fraudsters>“ dated October 11, 2021.

9. Attached hereto as **Exhibit H** is a true and correct copy of summary screenshots of the iFunny.co Haynes Hansen “Ram Ranch” video dated January 2, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of Mahesha Subbaraman emails to me dated March 10-12, 2013.

**PLAINTIFF BROCK FREDIN'S JANUARY 3, 2022 RESPONSE**

11. I did not willfully or intentionally violate the injunction.

12. The new videos and websites are not “substantially similar” because there is no pending litigation.

13. The videos and website in question are new.

14. The new videos and websites do not contain “substantially similar” allegations or content.

15. The new videos and websites are not “substantially similar” because they contain content related to legal cases or controversies where I am not involved.

16. I did not publish the Haynes Hansen “Ram Ranch” video to <https://ifunny.co/video/an-actual-youtube-ad-haynes-hansen-associate-at-robins-kaplan-ug3V3SaG8>.

17. Moreover, I did not publish the Haynes Hansen “Ram Ranch” video to any new platform following the November 23, 2020 injunction. Furthermore, I did not direct any third party to publish the video to any platform including iFunny.co. I was not aware of the video or website until doing research on my most recent set of appellate briefs in this case.

18. Anne Lockner’s statement that I “reposted” the video is knowingly false. (See *Fredin v. Kreil*, Lockner Decl. p. 3 ¶ 6, Dock. No. 154.)

19. I believe it’s possible that Defendants posted the video or directed a third party to post the video to iFunny.co as yet another means to entrap me. (See Ex. A.)

20. I have known Mahesha Subbaraman for thirty-three (33) years. Mr. Subbaraman and I attended grade school together in Apple Valley/Burnsville, Minnesota. It must be said that Mr. Subbaraman and I grew up together in the same neighborhood. In 2013, I formed a brief attorney-client privilege with Mr. Subbaraman while he was working at Robins Kaplan with respect to a legal matter. (See Ex. B.) Ms. Lockner’s statements that the videos about Mr. Subbaraman violate the November 23, 2020 injunction are false because Mr. Subbaraman could not have represented Defendants given his conflict with me. (See *Fredin v. Kreil*, Lockner Decl. p. 4 ¶ 19, Dock. No. 154.)

21. This same assertion raises the question how Robins Kaplan can represent Defendants when Robins Kaplan previously formed a brief attorney-client privilege with me through Mr. Subbaraman.

22. I have known Philip Sieff for upwards of ten (10) years.

23. I have personally witnessed Mr. Sieff state publicly that he “relapsed” with respect to an addictive drug.

24. Mr. Sieff made these statements at a location in Minneapolis, Minnesota.

25. Over the course of ten (10) years, I personally witnessed Mr. Sieff repeatedly state that he “relapsed” or make statements consistent with the same. At times, I recall Mr. Sieff state that he was “struggling” to remain sober given the stress incurred of litigation and his life as an attorney.

26. During these times, I distinctly recall several previous or current clerks from the District Court of Minnesota present. At times, I saw Mr. Sieff talking to these clerks/attorneys. Similarly, this includes then active clerks from the Eighth Circuit.

27. Additionally, I recall the sons of federal judges present when Mr. Sieff made statements consistent with “relapse” and struggling to remain sober.

28. I believe that Eric J. Magnuson is a current partner at Robins Kaplan and a former *very brief* Chief Justice of the Minnesota Supreme Court.

29. I do recall likely meeting Chief Justice Eric J. Magnuson. Chief Justice Magnuson and I were both present at Chief Justice Douglas K. Amdahl’s funeral. I believe Chief Justice Magnuson may have escorted my sister Faith Amdahl during Chief Justice Amdahl’s final burial process at Fort Snelling.

30. Given this conflict, the November 23, 2020 injunction could not apply to Robins Kaplan partner Philip Sieff or Chief Justice Eric J. Magnuson.

31. Similarly, the websites involving Eighth Circuit Judge David Stras do not violate the November 23, 2020 injunction. Judge Stras signed an *en banc* Order with respect to the same injunction.

#### **PLAINTIFF BROCK FREDIN’S JANUARY 3, 2022 SANCTIONS**

32. As described above, Ms. Lockner’s statements regarding the Haynes Hansen video “respost” are knowing false and best addressed with sanctions.

33. K. Jon Breyer filed a late supplemental brief or declaration stating that criticism involving his Tom Petters trustee representation with Doug Kelley was a violation of the November 23, 2020 injunction. This is false and best addressed with sanctions.

34. I was employed at Fingerhut's newly formed holding company, Blue Stem Brands, on the payments team as a software developer during portions of the bankruptcy.<sup>1</sup> The injunction does not preclude me from criticizing K. Jon Breyer's corrupt litigation practice with respect to his representation tied to a company where I previously worked.

35. I am requesting that Defendants and their counsel Robins Kaplan and Kutak Rock be referred to the state and federal Office of Professional Responsibility.

Dated: January 10, 2022  
Saint Croix County, WI



s/ Brock Fredin

Brock Fredin  
Saint Croix County, WI 54002  
(612) 424-5512 (tel.)  
brockfredinlegal@icloud.com  
*Plaintiff, Pro Se*

---

<sup>1</sup> See [linkedin.com/in/brockfredin/](https://www.linkedin.com/in/brockfredin/)

**A**

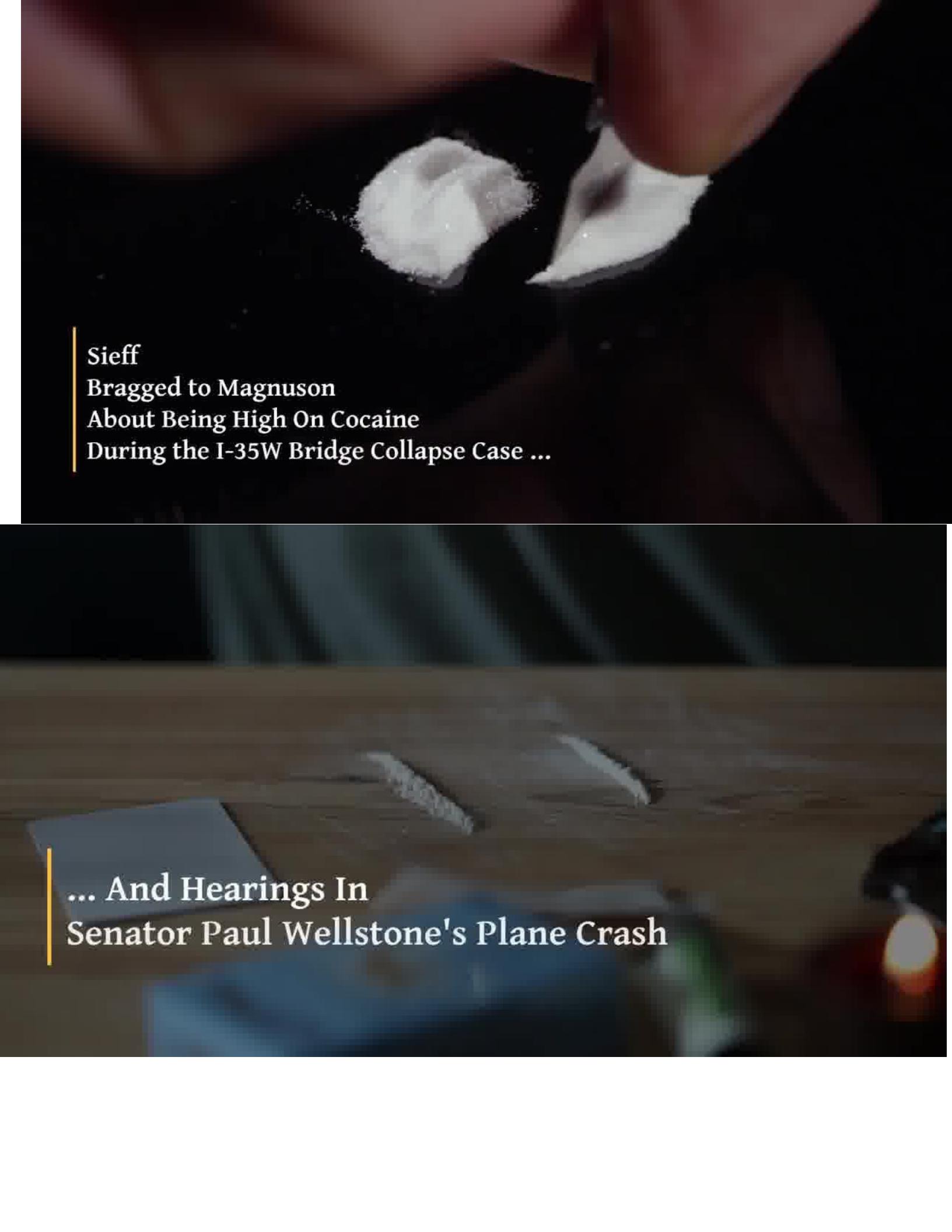


ROBINS ■ KAPLAN LLP

REWITING THE ODDS

## Self-Proclaimed "America's Top 100 Attorney" In Minneapolis

Philip Sieff  
Procured Young Women  
In Minneapolis' King Of Diamond Club  
With Eric J. Magnuson



**Sieff  
Bragged to Magnuson  
About Being High On Cocaine  
During the I-35W Bridge Collapse Case ...**

**... And Hearings In  
Senator Paul Wellstone's Plane Crash**

... And Hearings In  
Senator Paul Wellstone's Plane Crash





Philip Sieff Is A Fraudster  
and Drug Addict

# PhilipSieff.com

#DrugAddictSieff, #48HourHold  
#DisbarSieff, #DrugTreatmentForSieff

[www.PhilipSieff.com](http://www.PhilipSieff.com)

**B**



Anne M. Lockner (He/Him) Proudly Declares That He Is A Member Of The Executive Board

[AnneLockner.com](http://AnneLockner.com)



In Actuality, Lockner Manages Robins Kaplan With A Team Of Drug Addicts And Alcoholics



**Lockner Served On The Robins Kaplan Executive Board With Fellow Partner Philip Sieff**

ANNE LOCKNER  
[AnneLockner.com](http://AnneLockner.com) Business Litigation Board Member, and Volunteer



**Lockner Knew That Sieff Is A Drug Addict And Alcoholic**

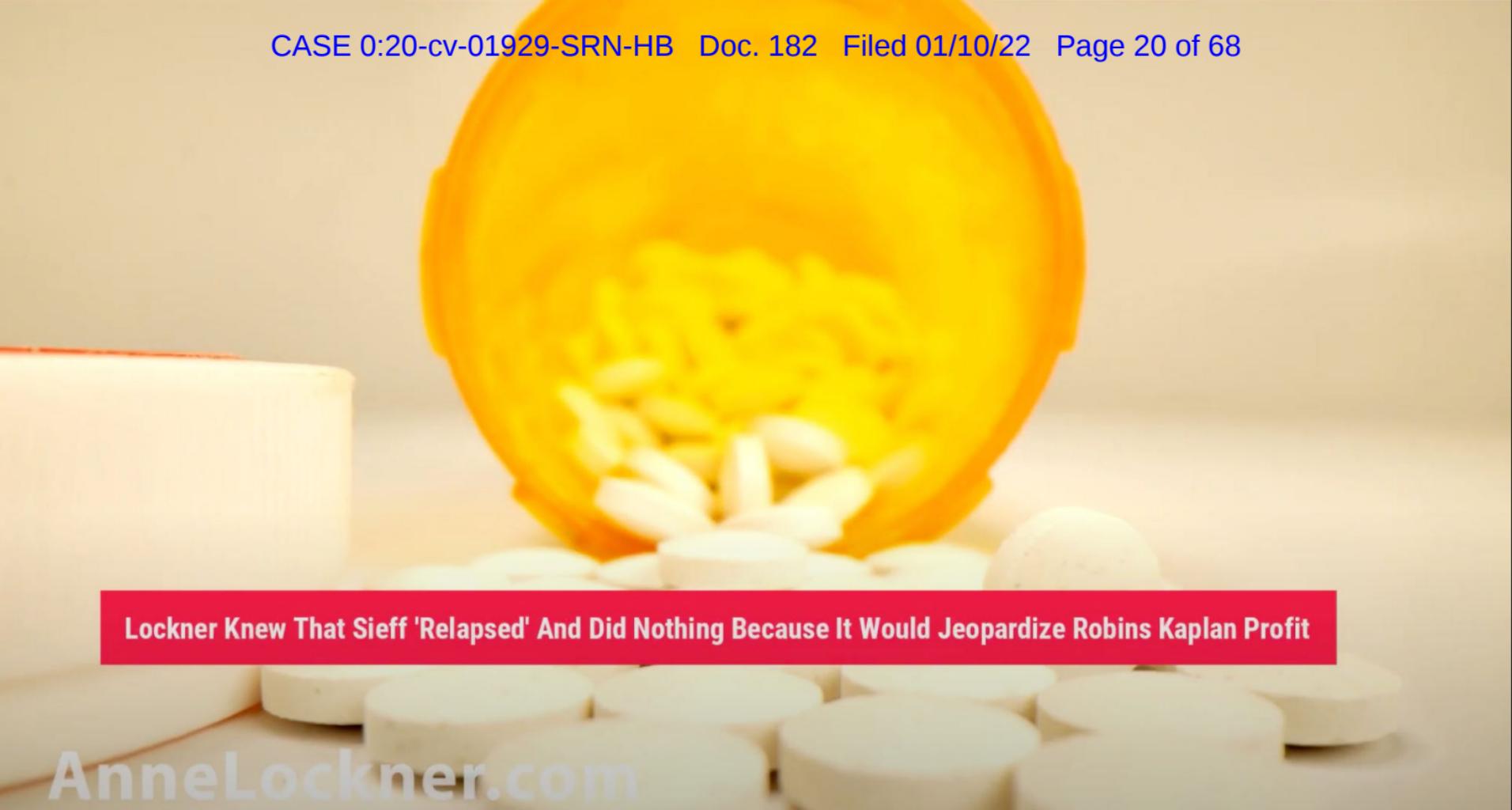
[AnneLockner.com](http://AnneLockner.com)



**Sieff Stated Publicly That He 'Relapsed' And Was 'Struggling' With Sobriety**



During The I-35W Bridge Collapse Case



**Lockner Knew That Sieff 'Relapsed' And Did Nothing Because It Would Jeopardize Robins Kaplan Profit**

**AnneLockner.com**



**Drug Addicts That Publicly State That They Had 'Relapsed' During The I-35W Bridge Collapse Cases**



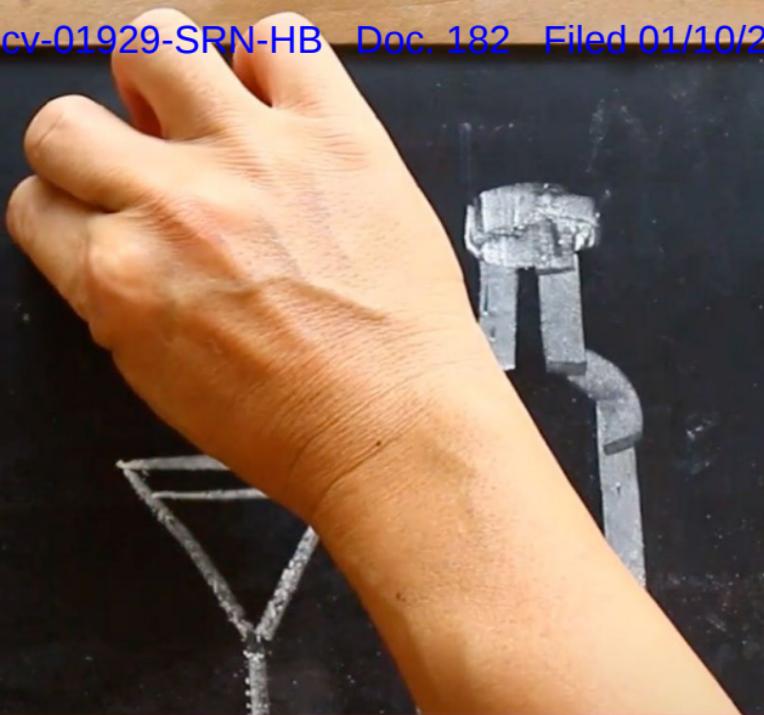
**In Other Words, Lockner Manages Robins Kaplan With A Team Of Drug Addicts And Alcoholics**



**Because It Would Jeopardize Robins Kaplan's Reputation And Credibility**



**Just As She Has Done In Many Other Instances Of Attorney Misconduct**



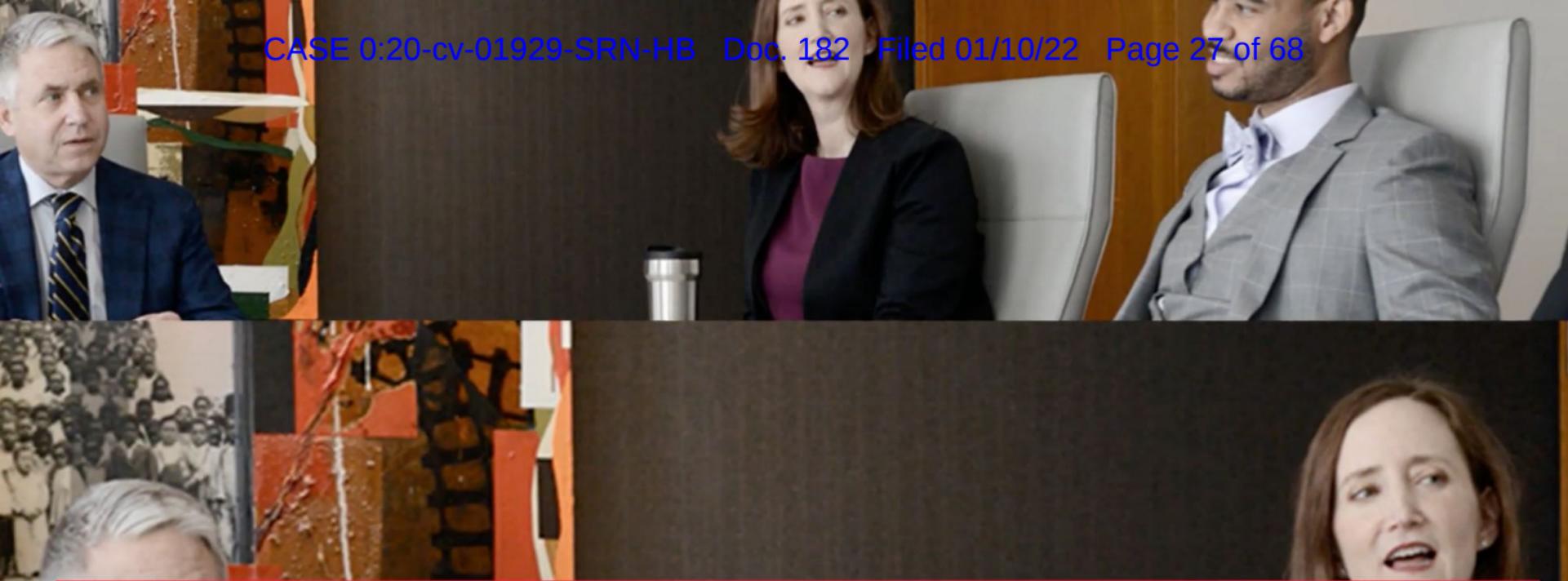
**Is Robins Kaplan The Firm You Want To Retain For Your Corporate Legal Affairs?**

**AnneLockner.com**



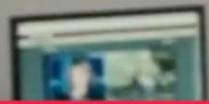
Is Lockner The Lawyer You Want To Retain? A Partner Who Manages Critical Cases Using Drug Addicts?

[AnneLockner.com](http://AnneLockner.com)



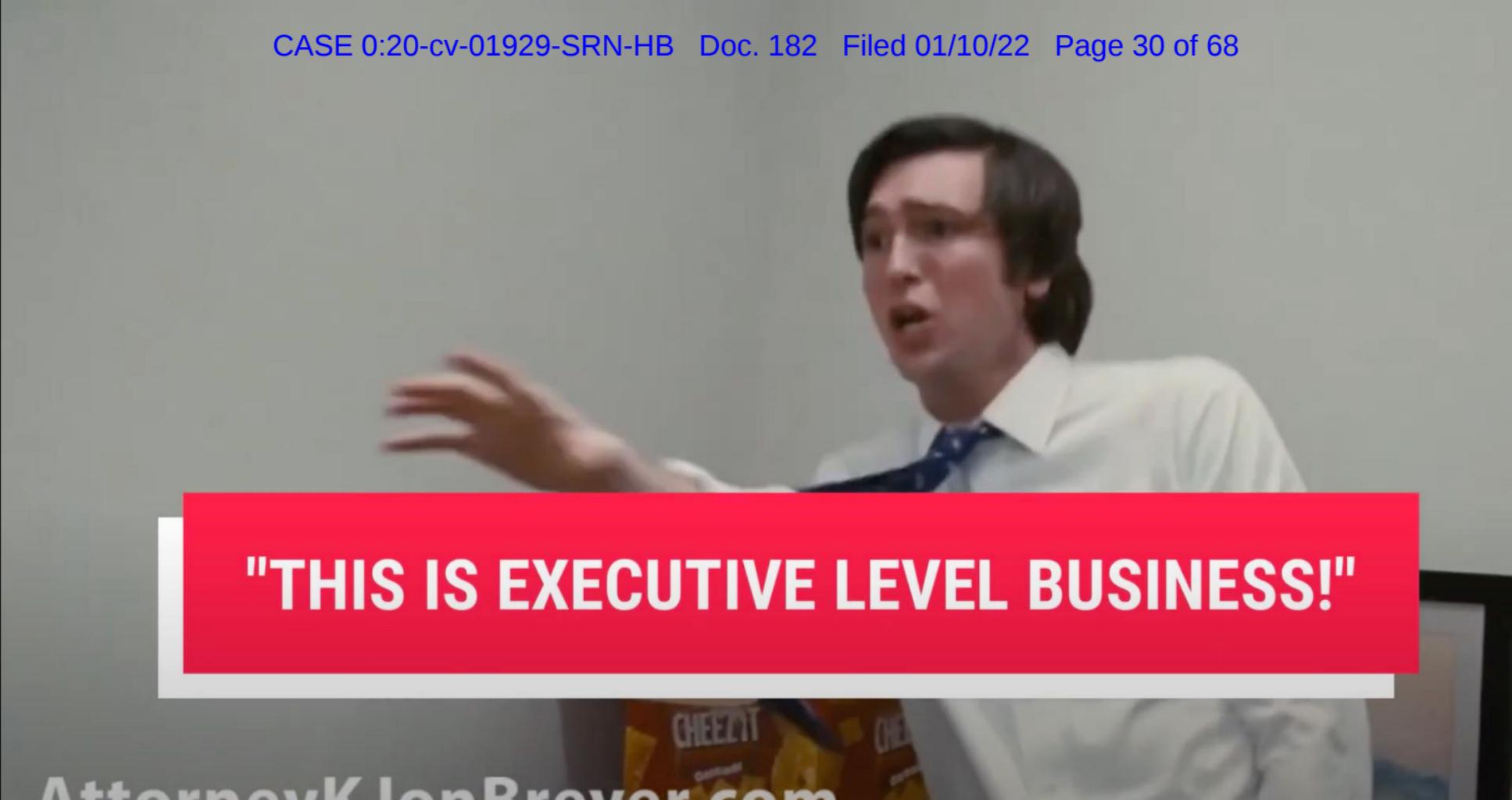
**An Attorney Who Tries To Cover Up Attorney Misconduct?**

C



**K. Jon Breyer Rapes Women And Abuses Associates**

**AttorneyKJonBreyer.com**



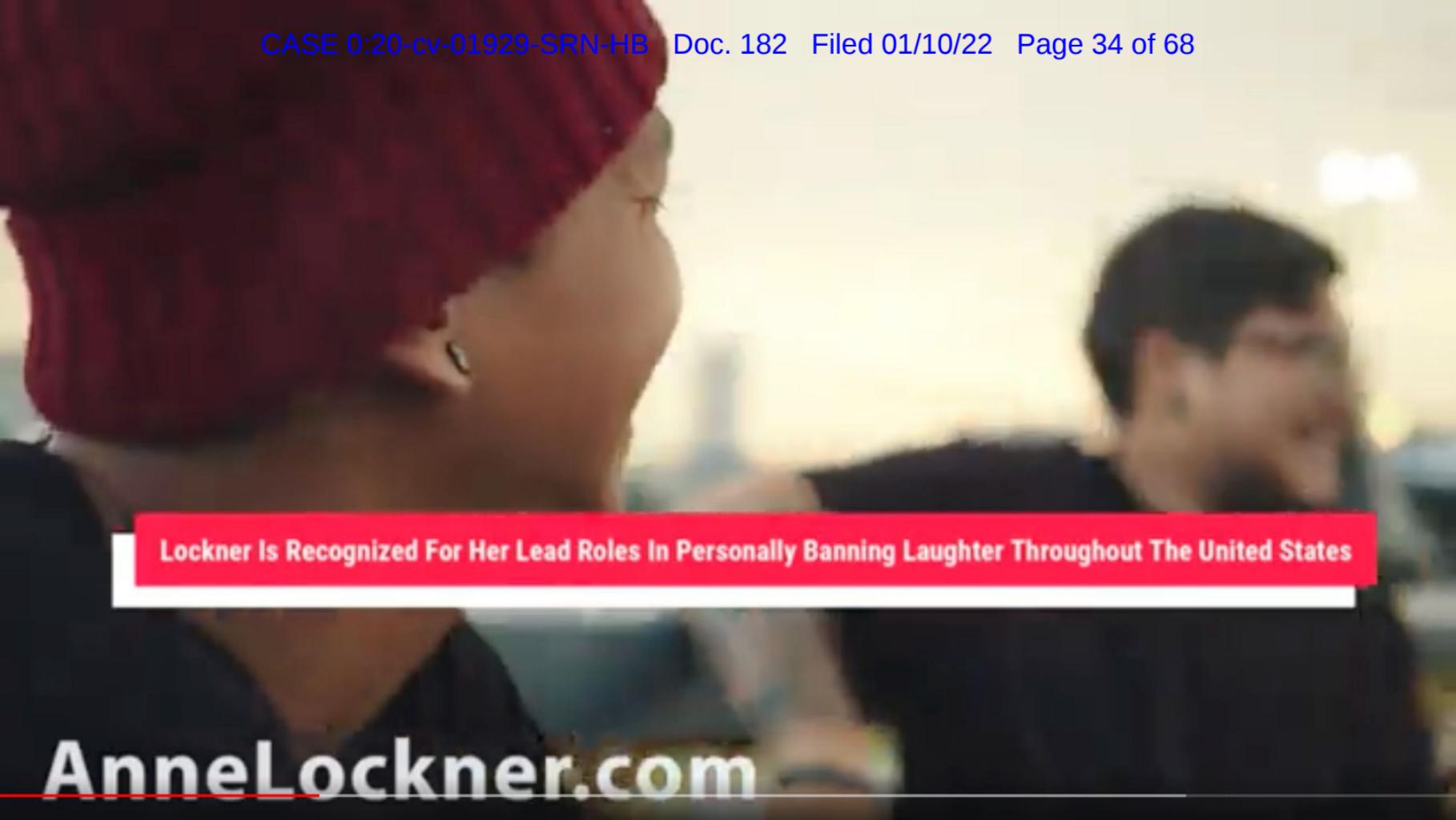
**"THIS IS EXECUTIVE LEVEL BUSINESS!"**

**D**



On December 17, 2021, Kim Jong Un Imposed A Strict Ban On Laughing





Lockner Is Recognized For Her Lead Roles In Personally Banning Laughter Throughout The United States

[AnneLockner.com](http://AnneLockner.com)



AnneLockner.com

The Order Stipulates That If A Resident Breaks The Laughter Ban, He Or She Can Be Arrested Or Fined

FRANK CAPRIO  
CHIEF JUDGE

A photograph of a man and a woman in a greenhouse. The man, on the left, is wearing a dark jacket over a plaid shirt and has a serious expression. The woman, on the right, is wearing a yellow t-shirt and a dark cap, smiling. The background shows the structural framework of the greenhouse with its diagonal beams and translucent panels.

Any Resident Found Guilty Is Arrested And Treated As An Ideological Criminal

AnneLockner.com



Lockner Drafted Language Requiring A 5 Year Long Special Duty On Police To "Crackdown" On Laughing

CAUGHT IN  
PROVIDENCE  
[AnnetLockner.com](http://AnnetLockner.com)



FRANK CAPRIO  
CHIEF JUDGE

CAUGHT IN  
PROVIDENCE  
[Annetockner.com](http://Annetockner.com)

# AnneLockner.com

Anne Lockner

Drafts Laughter Ban For Kim Jong Un

#Hilarious #NoLaughing #LaughterBanned #RapMusic

#WeDon'tListenToRap



**E**



MN Courtroom

Scroll for details



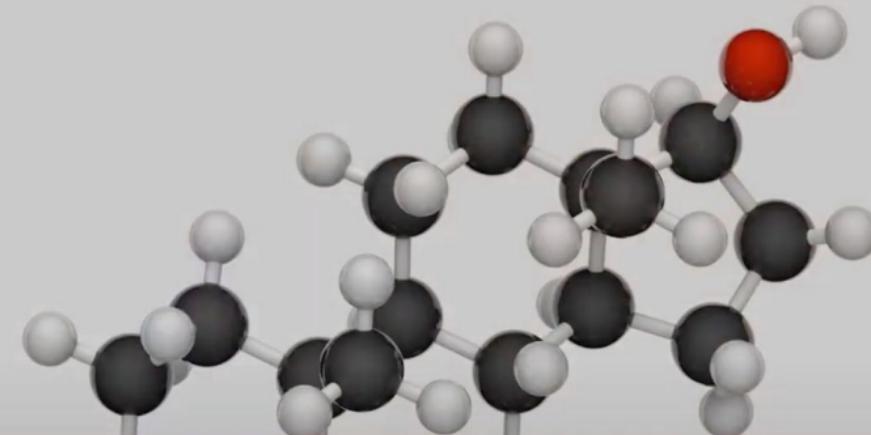
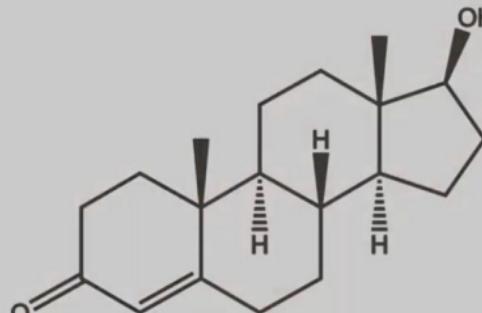
## Testosterone

 $C_{19}H_{28}O_2$ 

Hydrogen

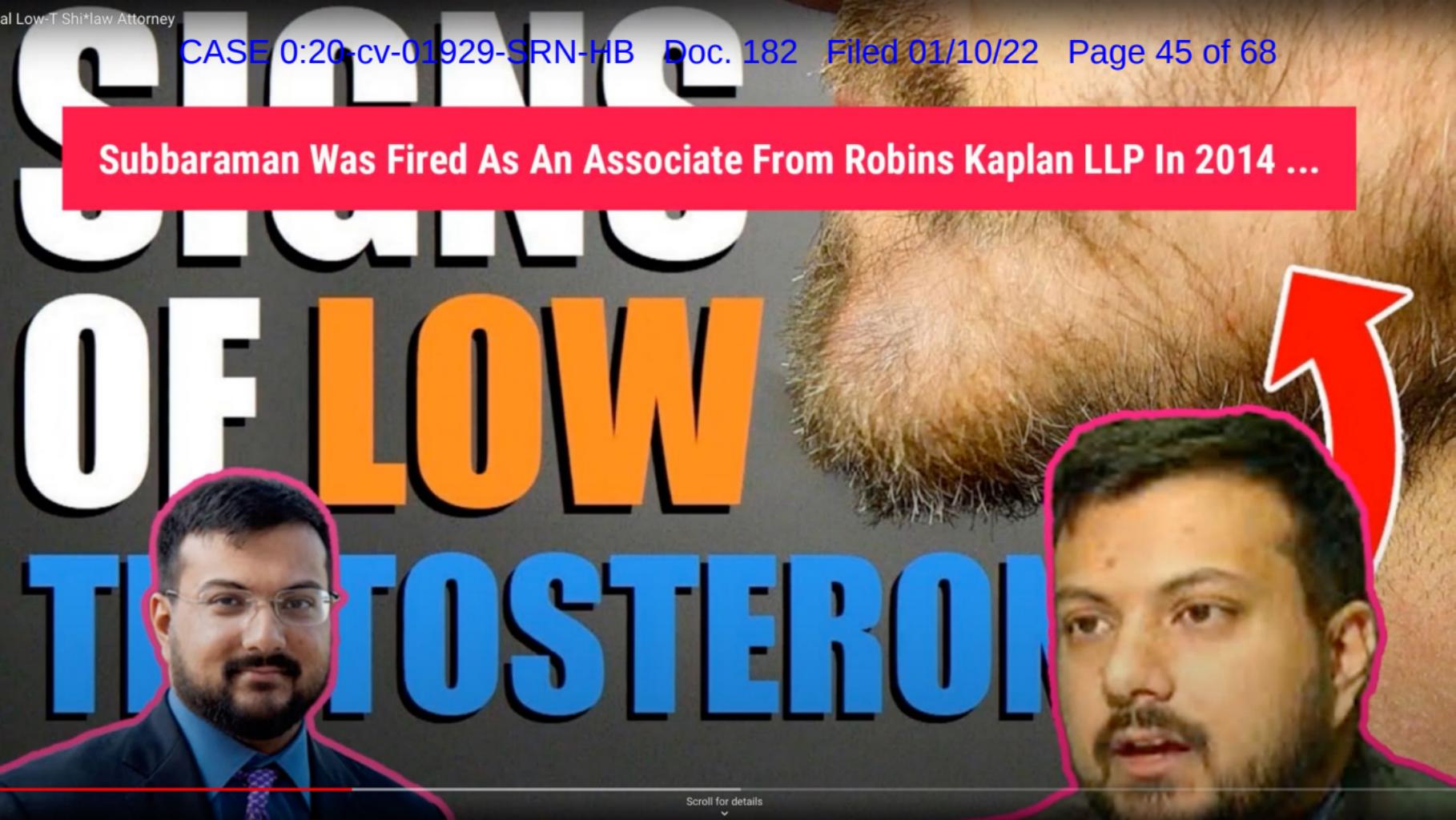


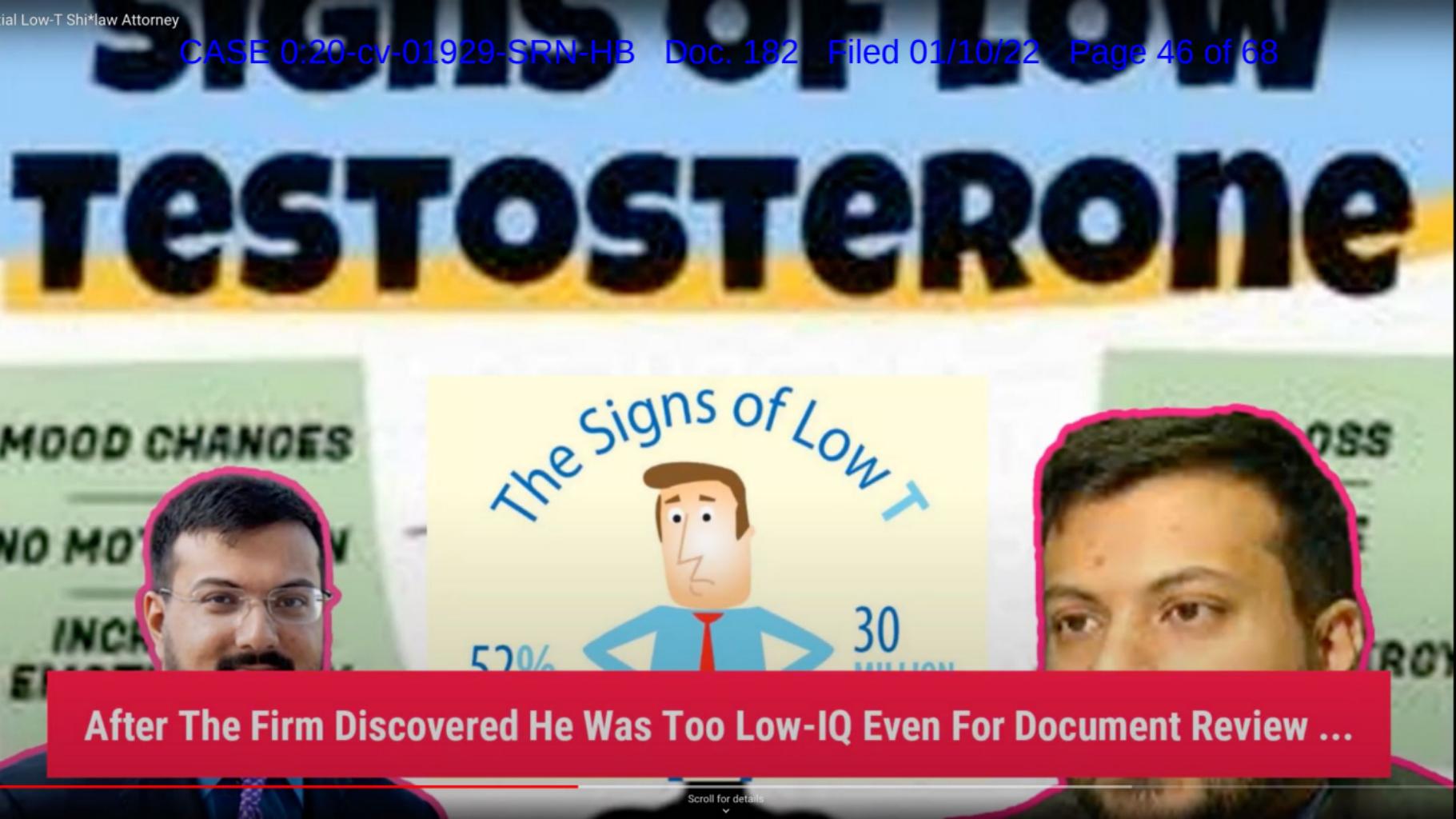
Carbon



In Reality, Subbaraman Is A Low-T Shitlaw Ambulance Chaser ...

Subbaraman Was Fired As An Associate From Robins Kaplan LLP In 2014 ...







**Mahesha Subbaraman: Quintessential Low-T Shitlaw Attorney**

LOW

TESTOSTERONE



**Mahesha Subbaraman: Quintessential Low-T Shitlaw Attorney**



**F**



**K Jon Breyer Claims To Be A "Minnesota Super Lawyer"...**

**KJonBreyer.com**



**K. Jon Advertises That He Represents  
"High Net Worth" Individuals And "Fortune 500 Companies"...**



## Minnesota Man Sentenced to 50 Years in Federal Prison for ...

Apr 8, 2010 — MINNEAPOLIS—Thomas Petters, age 52, of Wayzata, Minn., has been sentenced to 50 years in federal prison for orchestrating a \$3.7 ...



0:18

0. 08-45257 08-45258(GFK). 08-45326(GFK). 08-45327(GFK). 08-328(GFK). 08-45329(GFK). 08-45330(GFK). 08-45331(GFK). 08-371(GFK). 08-45392(GFK).

013-06-19

Kirstin D. Kanski, Terrence J. Fleming, **K. Jon Breyer**, Adam C. Ballinger, Mark D. Larsen, James A. Lodoen, Sandra S. Smalley-Fleming, Jeffrey D.

<https://www.brendagrantland.com> > PCI-BK PDF  
Petters Company, Inc., et al., Debtors. - Brenda Grantland  
01/10/2022 10:46 AM (ET) Case transferred to the Bankruptcy Court for the District of Minnesota to a  
Polaroid, JPMC received ... K. Jon Breyer (#302259), 3902 IDS Center.



## Tom Petters Was Convicted On Over 20 Counts Of Business Fraud...

### Minnesota Man Sentenced to 50 Years in Federal Prison for ...

Apr 8, 2010 — MINNEAPOLIS—Thomas Petters, age 52, of Wayzata, Minn., has been sentenced to 50 years in federal prison for conspiring to commit a \$3.7 ...



0.20

Scroll for details

By: s/ Thomas E. Jamison  
Thomas E. Jamison (#220061)  
Douglas L. Elsas (#219241)  
**K. Jon Breyer** (#302259)  
3902 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 344-9700  
Facsimile: (612) 344-9705

ATTORNEYS FOR DOUGLAS A.  
KELLEY CHAPTER 11 TRUSTEE

**For Stealing From Investors And His Employees...**

A black and white portrait of a man with dark hair and a slight smile, wearing a dark suit jacket, a light blue shirt, and a red tie. The background is a textured wall.

**TOM**

**And Was Sentenced To Over 50 Years In Prison...**

**PETTERS COMPANY INCORPORAT**



**K Jon Breyer Is A Low-T Loser Attorney Forced  
To Represent Fraudsters And Scumbags Like Tom Petters**

[JonBreyer.com](http://JonBreyer.com)

Scroll for details



**K Jon Breyer Is A Low-T Loser Attorney Forced  
To Represent Fraudsters And Scumbags Like Tom Petters**

FOX

PETTERS HEARING

[KJonBreyer.com](http://KJonBreyer.com)

Scroll for details

**G**

LEGAL

## K. Jon Breyer: Low-IQ Ambulance Chaser Defending Convicted Fraudsters

Low-T K. Jon Breyer steals money from fraud victims.



By Protest Press Staff  
Published October 11, 2021



# K. Jon Breyer

Low-IQ Ambulance Chaser Defending Convicted Fraudsters

K. Jon Breyer is an attorney who has made his living defending fraudsters, felons and pedophiles. Breyer defends fraudsters like Tom Petters.

Breyer represented the trustee in Minnesota's biggest Ponzi scheme where he bilked large attorney fees in an effort to divert money meant for victims of the fraud.

Petters was convicted on over 20 counts of business fraud for stealing from investors and his employees. Petters was sentenced to over 50 years in prison.

In effect, enabling Breyer to engorge himself unchecked in Petters bankruptcy trust where he and his team of lawyers including Doug Kelley ran all of Petter's companies into the ground in an effort to sell off any profitable asset to churn large sums for their firms.

Breyer picked away at the Petters bankruptcy carcass for years, until there was nothing left for unsecured creditors, like the bondholders, who are only one level above the stockholders in priority.



WRITTEN BY

## Protest Press Staff

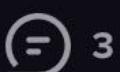
ProtestPress.com staff is dedicated to exposing the vast corruption and dysfunction throughout Minnesota, New York and Wisconsin. In addition, ProtestPress.com staff write about current trending activities on a more global scale.

 Click to comment

H



ORION 3 jan 2021



...

 Copy link

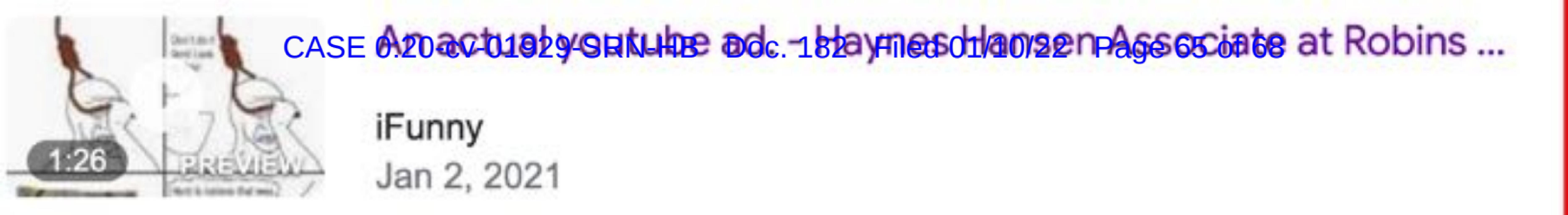
 Pinterest



## ORION

524 subscribers • 1.5K subscriptions

Photographer, car person, outdoorsman, volunteer firefighter.



CASE 0:20-cv-01929-SRN-HBE Doc. 182 Filed 01/10/22 Page 65 of 68 at Robins...

iFunny

Jan 2, 2021



**Mahesha Subbaraman** has sent you a message.

CASE 0:20-cv-01929-SRN-HB Doc. 182 Filed 01/10/22 Page 67 of 68

**Date:** 3/12/2013

**Subject:** Thanks for Coming out to Downtown for Lunch

Hey Brock – It was good having lunch with you today. I'm glad to see that [REDACTED]  
[REDACTED], and I much appreciated our discussion on a variety of subjects. Hope we can do it again in the future!

Best,

**Mahesha**

Mahesha Subbaraman has sent you a message.

**CASE 0:20-cv-01929-SRN-HB Doc. 182 Filed 01/10/22 Page 68 of 68**

**Subject:** RE: hey oh

Hey Brock,

Lunch this week sounds like a great idea!

I'm free on Tuesday and Thursday (say Noon?).

Do either of those days work for you?

Also, in terms of location, any place in downtown Minneapolis works for me – I'm a big fan of [REDACTED]  
[REDACTED] Capital Grille, and Atlas Grill.

Best,

**Mahesha**